

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

BROMBERG LAW OFFICE, P.C.,	)	
	)	Case No. 1:12-cv-02504-WDQ
Plaintiff,	)	
	)	Removal of Case No. 12-C-12-1420
v.	)	from the Circuit Court for
	)	Harford County, Maryland
MICHAEL CRAIG WORSHAM,	)	
MICHAEL C. WORSHAM, P.C., and	)	
INTERNAL REVENUE SERVICE,	)	
	)	
Defendants.	)	

**UNITED STATES' RESPONSE TO  
DEFENDANTS' MOTION TO REMAND**

The United States of America has filed a motion to dismiss (Dkt. No. 17) which asks that the Internal Revenue Service be dismissed as a party to this action and that the case be remanded to the Circuit Court for Harford County.

Defendants Michael Craig Worsham and Michael C. Worsham, P.C. have filed a

motion to remand. The United States does not oppose the relief sought in that motion so long as the Internal Revenue Service is first dismissed as a party defendant.

Dated: September 18, 2012.

Respectfully submitted,

KATHLEEN KENEALLY  
Assistant Attorney General

/s/ Gerald A. Role  
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